Exhibit F 1st Affidavit of Paul Wright

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

PRISON LEGAL NEWS, a non-profit	§
Washington corporation	§
Plaintiff	§ CIVIL ACTION NO.
V.	§
	§
GARY LINDSEY, individually and	§
in his official capacity as the Chief Deputy,	§
Office of Detentions for Dallas County,	§
UNKNOWN DALLAS COUNTY JAIL	§
GUARDS, individually and in their official	§
capacities, SHERIFF LUPE VALDEZ,	§
individually and in her official capacity as	§
the Sheriff of Dallas County, and DALLAS	§
COUNTY	§ §
	§
Defendants.	§
STATE OF VERMONT §	
§	
COUNTY OF WINDHAM §	

AFFIDAVIT OF PAUL WRIGHT

- 1. "My name is Paul Wright. I am the editor of Prison Legal News, and its legal representative.
- 2. Prison Legal News publishes a monthly 48-page legal information magazine dealing with the rights of incarcerated individuals. The publication provides information about court access, disciplinary hearings, prison conditions, excessive force, mail censorship, jail litigation, visitation, telephones, religious freedom, prison rape, and the death penalty, among other things. It has been published continuously since 1990. Prison Legal News has approximately 5,600 subscribers nationwide.
- 3. Prison Legal News presently has nine subscribers who are incarcerated in the Dallas County Jail.
- 4. On or about August 1, 2006, Prison Legal News began to receive letters from our subscribers in the Dallas County Jail complaining that they were not receiving their magazines. Prior to receiving these complaints, Prison Legal News had no idea the subscribers were not receiving the magazine. At no point has the Dallas Jail or any of its employees informed Prison Legal News that our magazine is being censored, the basis for the censorship nor what administrative appeal options, if any, we have.
- 5. My staff contacted the Dallas County Jail to inquire why the subscribers were not receiving Initial _____ Appendix p. 32

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the magazine. My staff was informed on or about January 31, 2007 of the publication ban at the jail. My staff was not provided with a written copy of the policy at this time, despite requesting one. This was the first time Prison Legal News became aware of the publication ban.

- 6. To the best of my knowledge, Prison Legal News' subscribers are still unable to receive their copies of the magazine. Prison Legal News has continued to send copies of the magazine to our subscribers in the jail, despite learning about the publication ban. Prison Legal News still desires to communicate with our subscribers in the jail.
- 7. Prison Legal News feels Dallas County, Deputy Lindsey and Sheriff Valdez are violating its' free speech rights. Prison Legal News' mission is to educate and inform inmates about their legal rights. Prison Legal News cannot accomplish this mission in Dallas County because of the publication ban.
- 8. Prison Legal News has no other adequate method of communication with our subscribers in the jail besides the mail. The publication ban prevents Prison Legal News from communicating with inmates in the jail, including its subscribers.
- 9. I, Paul Wright, under the pains and penalties of perjury under the laws of the United States of America, swear I am capable of making this affidavit and that the foregoing statement is true and correct to the best of my knowledge."

Paul Wrigh

February 21, 2007

Date